

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

NOVARTIS PHARMACEUTICALS
CORPORATION, NOVARTIS
CORPORATION, AND NOVARTIS AG

Plaintiffs,

V.

WOCKHARDT USA LLC; and
WOCKHARDT LTD.

Defendants.

Civil Action No. 12-03967 (SDW) (MCA)

NOVARTIS'S NOTICE OF MOTION TO SEAL

Motion Day: June 17, 2013

NOVARTIS PHARMACEUTICALS
CORPORATION, NOVARTIS
CORPORATION, AND NOVARTIS AG

Plaintiffs,

V.

SUN PHARMA GLOBAL FZE AND SUN
PHARMACEUTICAL INDUSTRIES
LIMITED

Defendants.

Civil Action No. 12-04393 (SDW) (MCA)

(Consolidated with Civil Action No. 12-03967)

NOVARTIS PHARMACEUTICALS
CORPORATION,

Plaintiff,

v.

ACTAVIS LLC; APOTEX, INC.;
APOTEX, CORP.; GLAND PHARMA
LTD.; DR. REDDY'S LABORATORIES,
INC.; DR. REDDY'S LABORATORIES
LTD.; EMCURE PHARMACEUTICALS
USA, INC.; EMCURE
PHARMACEUTICALS, LTD; HOSPIRA,
INC.; PHARMACEUTICS
INTERNATIONAL INC.; SAGENT
PHARMACEUTICALS, INC.; ACS
DOBFAR INFO S.A.; STRIDES, INC.;
AGILA SPECIALTIES PRIVATE LTD.;
SUN PHARMA GLOBAL FZE;
CARACO PHARMACEUTICAL
LABORATORIES, LTD; SUN
PHARMACEUTICAL INDUSTRIES
LTD.; WOCKHARDT USA LLC; and
WOCKHARDT LTD.

Defendants.

NOVARTIS PHARMACEUTICALS
CORPORATION,

Plaintiff,

v.

ACCORD HEALTHCARE INC.;
FRESENIUS KABI USA, LLC; and
HIKMA FARMACEUTICA S.A.,

Defendants.

Civil Action No. 13-1028 (SDW) (MCA)

Civil Action No. 13-2379 (SDW) (MCA)

PLEASE TAKE NOTICE that on June 17, 2013, or as soon as counsel can be heard, the undersigned counsel for Plaintiffs Novartis Pharmaceutical Corporation, Novartis Corporation, and Novartis AG (“Novartis”) shall move pursuant to Local Civil Rule 5.3(c) before the Honorable Madeline Cox Arleo, U.S.M.J., at the United States District Court for the District of New Jersey, for an Order sealing the following documents [12-3967, D.I. 62, 71; 13-1028, D.I. 189, 233; 13-2379, D.I. 6, 13]:

- 1) Portions of Novartis’s Brief in Support of Its Motion to Consolidate;
- 2) Exhibits 5-10, 14-21, and 24 attached to the Declaration of Robert W. Trenchard in Support of Novartis’s Motion to Consolidate;
- 3) Portions of Novartis’s Reply Brief in Further Support of Its Motion to Consolidate; and
- 4) Exhibit 1 attached to the Declaration of Robert W. Trenchard in Support of Novartis’s Reply Brief in Further Support of Its Motion to Consolidate.

PLEASE TAKE FURTHER NOTICE that Plaintiff submits a publicly redacted version of Novartis’s Brief and Reply Brief in Support of Its Motion to Consolidate.

PLEASE TAKE FURTHER NOTICE that Plaintiff submits the enclosed Memorandum in Support of this Motion to Seal, pursuant to Local Civil Rules 5.3(c)(1) and 7.1, and the Certification of Rachel L. Weiner attesting to the good cause for an Order sealing the above-referenced documents.

PLEASE TAKE FURTHER NOTICE that in support of the within Motion to Seal, Memorandum and Certification of Rachel L. Weiner, and any additional submissions made hereafter, a proposed Order is also submitted.

DATED: May 14, 2013

s/ William J. O'Shaughnessy
William J. O'Shaughnessy
MCCARTER & ENGLISH LLP
Four Gateway Center
100 Mulberry Street
Newark, NJ 07102
(973) 639-2094
woshaughnessy@mccarter.com

*Attorneys for Novartis Pharmaceuticals
Corporation, Novartis Corporation, and Novartis
AG*

OF COUNSEL:

Jane M. Love, Ph.D.
Robert Trenchard
Martin E. Gilmore
Sadaf R. Abdullah
WILMER CUTLER PICKERING
HALE AND DORR LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
(212) 230-8800

Lisa J. Pirozzolo
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
(617) 526-6000

Rachel L. Weiner
WILMER CUTLER PICKERING
HALE AND DORR LLP
1875 Pennsylvania Avenue NW
Washington, DC 20006
(202) 663-6000

*Attorneys for Novartis Pharmaceuticals
Corporation, Novartis Corporation, and
Novartis AG*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that true copies of the foregoing Notice of Motion to Seal and supporting documents were caused to be served on May 14, 2013 via email and/or the ECF system upon all counsel of record.

By: s/ William J. O'Shaughnessy
William J. O'Shaughnessy